

Governor

JOHN A. SANCHEZ

Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building 1190 South St. Francis Drive (87505) P.O. Box 5469, Santa Fe, NM 87502-5469 Phone (505) 827-0187 Fax (505) 827-0160 www.env.nm.gov



BUTCH TONGATE Cabinet Secretary

J. C. BORREGO Deputy Secretary

Certified Mail - Return Receipt Requested

April 20, 2017

Mr. Klaus Klemmer, Wastewater Administrator City of Las Cruces 680 N. Motel Blvd. Las Cruces, NM 88007

Re: Jacob Hands – Las Cruces Wastewater Treatment Plant; Major; Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0023311; March 21, 2017

Dear Mr. Klaus Klemmer:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator Environmental Protection Agency, Region 6 NPDES Enforcement Branch (6EN-WM) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733 Program Manager New Mexico Environment Department Surface Water Quality Bureau (N2050) Point Source Regulation Section P.O. Box 5469 Santa Fe, New Mexico 87502

Jacob Hands – Las Cruces Wastewater Treatment Plant, NPDES # NM0023311 April 20, 2017 Page 2 of 2

David Long is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb Program Manager Point Source Regulation Section Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Michael Kesler, NMED District III by e-mail
Lorenzo Martinez, City of Las Cruces by e-mail
Joshua Rosenblatt, City of Las Cruces by e-mail

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85



NPDES Compliance Inspection Report

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SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS \boxtimes S \square M \square U \square NA (FURTHER DETAILS:	EXPLANATION ATTACHED <u>NO</u>)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	\boxtimes Y \square N \square NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	\square Y \square N \boxtimes NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	\boxtimes Y \square N \square NA
4. ALL DISCHARGES ARE PERMITTED	⊠ Y □ N □ NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. \square S \square M \square U \square NA (Further Details:	EXPLANATION ATTACHED NO
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	⊠Y□N □NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	\boxtimes S \square M \square U \square NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	\boxtimes Y \square N \square NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	\boxtimes Y \square N \square NA
c) ANALYTICAL METHODS AND TECHNIQUES.	\boxtimes Y \square N \square NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	\boxtimes Y \square N \square NA
e) DATES AND TIMES OF ANALYSES.	\boxtimes Y \square N \square NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	\boxtimes Y \square N \square NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	\boxtimes S \square M \square U \square NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	\boxtimes S \square M \square U \square NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	\boxtimes Y \square N \square NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. \square S \boxtimes M \square U \square NA (Further Details:	EXPLANATION ATTACHED <u>YES</u>)
1. TREATMENT UNITS PROPERLY OPERATED.	\boxtimes S \square M \square U \square NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	\boxtimes S \square M \square U \square NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	\boxtimes S \square M \square U \square NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	\boxtimes S \square M \square U \square NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	\boxtimes S \square M \square U \square NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	\boxtimes S \square M \square U \square NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	\boxtimes S \square M \square U \square NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	\boxtimes Y \square N \square NA \boxtimes Y \square N \square NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	\boxtimes Y \square N \square NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	□ Y ⋈ N □ NA □ Y □ N ⋈ NA □ Y □ N ⋈ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□ Y ⋈ N □ NA □ Y □ N ⋈ NA
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. \boxtimes S \square M \square U \square NA (Further explanation) DETAILS:	ATTACHED <u>NO</u>).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	\boxtimes Y \square N \square NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	\boxtimes Y \square N \square NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	\boxtimes Y \square N \square NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	\boxtimes Y \square N \square NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	\boxtimes Y \square N \square NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	\boxtimes Y \square N \square NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	\boxtimes Y \square N \square NA
b) PROPER PRESERVATION TECHNIQUES USED.	\boxtimes Y \square N \square NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	\boxtimes Y \square N \square NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	⊠Y□N □NA
SECTION E - FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.	TTACHED <u>NO</u>)
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE 24" parshall	⊠ Y □ N □ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	\boxtimes Y \square N \square NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	\boxtimes Y \square N \square NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION monthly) RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	 ⊠ Y □ N □ NA ⊠ Y □ N □ NA ⊠ Y □ N □ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	\boxtimes Y \square N \square NA
6. HEAD MEASURED AT PROPER LOCATION.	⊠ Y □ N □ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	⊠ Y □ N □ NA
SECTION F – LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION AT DETAILS:	TACHED <u>YES</u>
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)	\boxtimes Y \square N \square NA

SECTION F - LAB	SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA								
	B. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.							
	4. QUALITY CONTROL PROCEDURES ADEQUATE. □ S □ M ⊠ U □ NA							
	4. QUALITY CONTROL PROCEDURES ADEQUATE. □ S □ M ⊠ U □ NA 5. DUPLICATE SAMPLES ARE ANALYZED% OF THE TIME. □ Y ⊠ N □ NA							
	ARE ANALYZED.					□ Y □ N		
		70 OF THE TIME.						
7. COMMERCIAL LA LAB NAME	BORATORY USED.					⊠ Y □ N	□ NA	
LAB ADDRESS								
PARAMETERS PER	RFORMED							
SECTION C. FEI	EL LUCAUP/DE/CICIN/INI	IC WATERS ORSE		C M M D II D NA		W		
	FLUENT/RECEIVIN	GREASE		S ⋈ M □ U □ NA VISIBLE FOAM		COLOR	OTHER	
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001	none	Hone	Siigit	Siight	none	none		
RECEIVING WATER	OBSERVATIONS							
SECTION H - SLUDGE DISPOSAL								
SECTION H - SLU	UDGE DISPOSAL							
	UDGE DISPOSAL L MEETS PERMIT REQ	UIREMENTS.		⊠ S □ M □ U □ N.	A (FURTHER EXPLANATIO	N ATTACHED <u>NO</u>).		
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SLUDGE DISPOSAL DETAILS: 1. SLUDGE MANAGE 2. SLUDGE RECORE 3. FOR LAND APPLE SECTION I - SALE 1. SAMPLES OBTALE 2. TYPE OF SAMPLE GRAB 3. SAMPLES PRESENTED SAMPLE OBTAIN 5. SAMPLE OBTAIN 6. SAMPLE SPLIT VERSENTED SAMPLE SPLIT VE	L MEETS PERMIT REQ GEMENT ADEQUATE TO DS MAINTAINED AS R LIED SLUDGE, TYPE OF MPLING INSPECTION INED THIS INSPECTION COM ERVED. GONED SAMPLES OBT NED FROM FACILITY'S SENTATIVE OF VOLUM	F LAND APPLIED TO: ON PROCEDURES N. APOSITE SAMPLE AINED. S SAMPLING DEVICE. ME AND MATURE OF I	ENT QUALITY. 503. public (e.g.) (FURTHER EXPLANATION METHOD F	g., FOREST, AGRICULTU ON ATTACHED <u>NO</u>).		S	□ NA □ NA	

City of Las Cruces – Jacob Hands Wastewater Treatment Plant Compliance Evaluation Inspection NPDES Permit No. NM0023311 March 21, 2017 Further Explanations

INTRODUCTION:

On March 21, 2017, Jennifer Foote of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at City of Las Cruces – Jacob Hands Wastewater Treatment Plant (WWTP)). This facility is classified as a major discharger under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0023311. The facility design flow is 13.5 million gallons per day (MGD). The Jacob Hands Wastewater Treatment Plant discharges into the Rio Grande Basin in Segment 20.6.4.101 (NMAC State of New Mexico Standards for Interstate and Intrastate Surface Waters). Designated uses of segment 20.6.4.101 are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of inspections for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by NMED staff, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:

The inspector arrived at the Jacob HandsTreatment Facility at 0810 hours and made introductions, stated the purpose of the inspection, and Ms. Foote presented credentials to Mr. Lorenzo Martinez, Plant Manager. The inspector toured the facility with Mr. Martinez and Mr. Joshua Rosenblatt, Regulatory and Environmental Analyst and then Mr. Luis Guerra provided a tour of the laboratory. An exit conference was conducted to discuss preliminary findings with Mr. Martinez, Mr. Rosenblatt, and Mr.Klaus Klemmer, Wastewater Administrator. The inspector left the facility at approximately 1:20 pm on the day of this inspection.

TREATMENT SCHEME:

Raw influent arrives at the plant from 20-30 lift stations around the city, with three submersible pumps in the primary lift station. Influent enters mechanical bar screens where large debris is removed. It then flows to the grit washer and the aerated grit remover where further debris is removed from the influent. Biofilters have been installed for odor control. It then flows to the equalization basin and then enters the primary clarifiers. There are two primary clarifiers available at this plant and as such, one clarifier is online continuously. The clarifiers are rotated every six months. From the primary clarifiers flow enters the roughing filters. There are two aeration basins after the roughing filters, the east and west basins. Final clarifiers are used prior to chlorination and dechlorination. Effluent is then released through a 24" Parshall flume to an unnamed ditch, thence the Rio Grande.

The Jacob Hands Wastewater Treatment Plant is a 13.5 MGD facility. The plant underwent an expansion in 2009 which included the installation of biofilters for odor control. The facility plans to build a new lab this year. They are currently rehabbing one of the clarifers.

SLUDGE:

Waste Activated Sludge (WAS) is removed to the gravity thickener then to the centrifuge thickener, to the primary and secondary digesters. Solids from the East Mesa Plant are also sent to the digester at this facility. Digester gas is produced and sent to the CoGen System. Sludge is sent offsite to be composted after the belt press.

SEPTAGE RECEIVING:

This facility does not receive septage.

FINDINGS:

Section C - Operation and Maintenance - Overall Rating "Marginal"

The permit requires, in Part III, Section B.3 Proper Operation and Maintenance:

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the

conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

Findings for Operation and Maintenance:

- Algae was growing in the aeration basin (photo 1).
- An improvement noted since the last inspection is that a new system was installed for brushes to continuously clean algae at the clarifier (photo 2).
- During this inspection, the secondary clarifier had uneven flow over the weirs. Wastewater should be evenly dispersed across the entire cross section of the tank (photo 3).
- The visual gage on the parshall flume is damaged and unreadable, the flowmeter is calibrated monthly by facility personnel measuring flow with a ruler (photo 4).

Section G – Effluent/Receiving Waters Observations – Overall Rating of "Marginal"

Permit requires in Part I, Section A. Limitations and Monitoring Requirements:

EFFLUENT			MONITORING				
CHARACTERISTICS	lbs/e	day, unless noted		mg/I,	unless no	REQUIREMENTS	
POLLUTANT	30-DAY AVG	7-DAY AVG	DAILY MAX		7-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY
Flow	Report, MGD	Report, MGD					Daily
BOD	3379	5069	NIA	30	45	NIA	Daily
BOD, minimum %	85						I/week
TSS	3379	5069	NIA	30	45	NIA	Daily
TSS, minimum %	85						I/week
E. coli bacteria (*8)	4.25 x 10 ¹⁰ cfu/day (*9)	NIA	Report	126 cfu/100	NIA	410 cfu/100 ml	Daily
TRC	NIA	NIA	NIA	NIA	NIA	11 ug/I (*4)	Daily

EFFLUENT CHARACTERISTICS	DISCHARG	E MONITORING	MONITORING REQUIREMENTS			
WHOLE EFFLUENT TOXICITY TESTING 7-DAY CHRONIC NOEC FRESHWATER (*5)	30-DAY AVG		MEASUREMENT FREQUENCY (*6)	SAMPLE TYPE		
Ceriodaphnia dubia	Report	Report	I/Quarter	24-hr Composite		
Pimephales promelas	Report	Report	I/Quarter	24-hr Composite		

Findings for Effluent/Receiving Waters Observations:

Since the last inspection, the permittee had the following exceedances reported on the DMRs as follows:

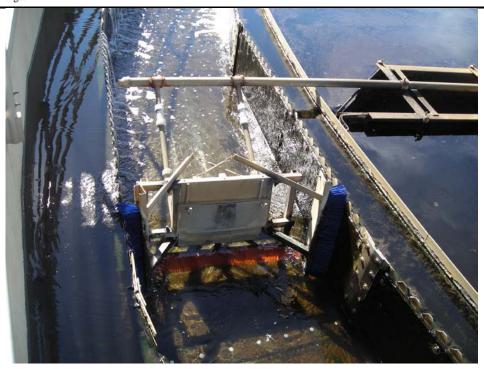
- E. coli exceedances 10/23/16, 12/16/16, 2/9/17, 2/18/17
- TRC exceedance 2/9/17
- 30day TSS Exceedance February 2017

In addition, there were WET Test sublethal chronic failures during March 2016, December 2016, and February 2017. On March 30, 2017 the facility notified EPA and NMED that they would be submitting a TRE Plan.

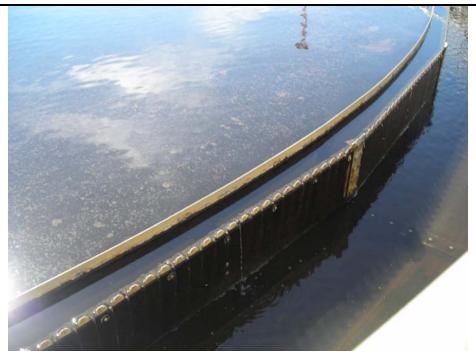
NMED/SWQB Official Photograph Log Photo #1						
Photographer: J. Foote	Date: 3/21/17	Time: abt 10 am				
City/County: Las Cruces/Dona Ana County	1	State: New Mexico				
Location: Jacob Hands WWTP						
Subject: algae growing on aeration basins	Subject: algae growing on aeration basins					



NMED/SWQB Official Photograph Log Photo # 2							
Photographer: J. Foote Date: 3/21/17 Time: abt 10 am							
City/County: Las Cruces/Dona Ana County		State: New Mexico					
Location: Jacob Hands WWTP	Location: Jacob Hands WWTP						
Subject: brushes to clean algae							



NMED/SWQB Official Photograph Log Photo # 3						
Photographer: J. Foote	Date: 3/21/17	Time: abt 10 am				
City/County: Las Cruces/Dona Ana Cour	nty	State: New Mexico				
Location: Jacob Hands WWTP						
Subject: uneven flow from clarifier						



	NMED/SWQB Official Photograph L Photo # 4	og				
Photographer: J. Foote	Date: 3/21/17	Time: abt 10 am				
City/County: Las Cruces/Dona Ana County		State: New Mexico				
Location: Jacob Hands WWTP	Location: Jacob Hands WWTP					
Subject: parshall flume						



NMED/SWQB Official Photograph Log Photo # 5						
Photographer: J. Foote	Date: 3/21/17	Time: abt 10 am				
City/County: Las Cruces/Dona Ana County		State: New Mexico				
Location: Jacob Hands WWTP						
Subject: discharge at Rio Grande	Subject: discharge at Rio Grande					

